

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

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IARNACH TECHNOLOGIES LTD.,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,  
CHARTER COMMUNICATIONS HOLDING  
COMPANY, LLC, CHARTER  
COMMUNICATIONS OPERATING, LLC,  
SPECTRUM MANAGEMENT HOLDING  
COMPANY, LLC, and SPECTRUM GULF  
COAST, LLC,

Defendants.

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Civil Action No. 2:24-cv-00230-JRG

JURY TRIAL DEMANDED

**OPPOSED MOTION FOR EXPEDITED BRIEFING ON PLAINTIFF  
IARNACH TECHNOLOGIES LTD.'S MOTION TO COMPEL VENUE DISCOVERY**

Pursuant to LR-CV 7(e), Iarnach respectfully moves the Court to expedite briefing on its concurrently filed Motion to Compel Venue Discovery. Dkt. 73. Iarnach requests that Charter's Response deadline be shortened from 14 days to 7 days so that Charter's Response is due October 25, 2024. This request is necessary because Charter's Response would normally be due on November 1, 2024, but venue discovery closes October 31, 2024, leaving no time for the Court to rule.

Charter opposes this motion to expedite because it professes to not understand what relief is being requested in the Motion to Compel, and Charter says it would be too burdensome to try to understand the Motion to Compel and respond within seven days.

The Motion to Compel is only seven pages long and can be easily responded to in a week. The relief requested in that Motion to Compel was set forth in an email to Charter sent by Alden Harris on September 23, 2024. On September 30, Charter's counsel agreed to provide all of the discovery requested in that email (which is now being sought in the Motion to Compel). Had Charter not agreed to do this, Iarnach would have moved to compel back on September 30. After agreeing, Charter also requested a one-week extension to produce the agreed-upon discovery, which Iarnach did not oppose. At no point did Charter indicate it would not provide the discovery it had agreed to provide, otherwise Iarnach would have moved to compel immediately. Having run out the clock on venue discovery by representing it would comply, Charter cannot credibly claim it would be too burdensome to respond within seven days.

Dated: October 18, 2024

Respectfully submitted,

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*Counsel for Plaintiff Iarnach Technologies Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on all counsel of record via the Court's ECF system.

/s/ Alden G. Harris  
Alden G. Harris

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), the undersigned certifies that counsel for the parties conferred about this motion by telephone on October 18, 2024. As described in the motion above, Iarnach and Charter are conclusively at an impasse, leaving an open issue for the Court to resolve.

/s/ Alden G. Harris  
Alden G. Harris